



Health and Human Services Agency California Office of HIPAA Implementation

POLICY MEMORANDUM

TO: Department Chief Deputy Directors
Department HIPAA Coordinators

FROM: CALIFORNIA OFFICE OF HIPAA IMPLEMENTATION (CalOHI)

Title: HIPAA Implementation Plan	Number: PM 2002-11
Subject: Statewide Master Plan: Implementation Plan Requirements	Issue Date: October 25, 2002
Reference(s): <ul style="list-style-type: none">- CalOHI Information Memorandum 2002-04, HIPAA Privacy State Law Baseline- CalOHI Policy Memorandum 2002-08, HIPAA Implementation Schedule- Health & Safety Code, Section 130306 (a)(1)(A)	Expiration Date: Until rescinded or amended

PURPOSE To inform state departments of the requirement to submit, and the instructions for preparing a HIPAA Implementation Plan.

POLICY All impacted state departments are required to complete a single, department-wide Implementation Plan. Departments should provide updates of the Implementation Plan when any substantive changes in the Plan occur or when notified by CalOHI.

BACKGROUND Health & Safety Code, Section 130306 (a)(1)(A) mandates that CalOHI develop a Statewide Master Plan for HIPAA implementation. Federal regulations also require, as part of the HIPAA implementation process, that covered entities document processes, policies, communications, activities, actions or designations. This Implementation Plan will contribute toward meeting that federal requirement.

CalOHI's Policy Memorandum 2002-08 requires state departments to prepare an Implementation Schedule. This schedule, in combination with your department's strategies (Implementation Plan, on how you will accomplish the tasks identified in your schedule) will

**BACKGROUND
Continued**

constitute your Department's HIPAA Project Plan and contribute to the Statewide Master Plan. The Implementation Schedule identifies tasks (milestones and deliverables), whereas the plan defines the techniques and strategies to be utilized to manage the project (e.g. risk and issue identification and management) to ensure successful accomplishment of all tasks.

**IMPLEMENTATION
PLAN
REQUIREMENTS**

Your Implementation Plan should identify techniques and strategies that will be utilized to manage your department's HIPAA implementation project. The required reporting elements listed below reflect standard project management principles. Overall, CalOHI would like to know how you will accomplish the required tasks and who within your organization is responsible for implementing the requirements.

Your project management strategies must consider areas of potential risk and ensure no adverse impact to: patient care, continued reimbursement to providers, and continued federal reimbursement.

Overview

Provide:

- A brief statement that describes the department's overall approach and strategy to addressing HIPAA requirements,
- A description of how HIPAA impacts your department (e.g., health plan, trading partner, business associate), and what rules impact you (e.g., Privacy, Transactions and Code Sets),
- A list of the programs within your department that are impacted by HIPAA,
- A brief description of the types of change necessary, (e.g., automated system remediation, business process changes),
- A description of any major issues your department has identified (e.g., local codes).

Detail

Provide a detailed discussion of the following:

- Department's HIPAA implementation organization (e.g., project management office, steering committee, executive sponsor, interdisciplinary teams),
- Additional resources (beyond the current level of resources identified in your Quarterly Report) that will be required to accomplish the tasks,
- Scope management plan, including how the department will assure that HIPAA implementation addresses all required work, and a change control process to address potential scope changes,

**PLAN
REQUIREMENTS
Continued**

- Program planning and operations management to include strategies on how you will manage your Implementation Schedule to ensure timely performance of tasks,
- Project performance monitoring and control (quality control) strategies,
- Communication management strategies (A communication plan template will be available from CalOHI),
- Training and change management efforts to include strategies for Business Process Reengineering and how you will address potential staff resistance to change,
- Issue management processes to ensure issues are identified, resolved and tracked,
- Risk management processes to ensure potential threats to the successful implementation of rules are defined and provisions are made to minimize the negative effects on the project. Identify contingencies for potential areas of threat.
- Any other strategies the department considers critical for completion of its Implementation Plan.

**SUBMISSION
INSTRUCTIONS**

Who must prepare and submit

State departments impacted by HIPAA requirements (covered and impacted entities) are required to complete an Implementation Plan.

When Due

Each Department's Implementation Plan should be submitted to CalOHI by January 17, 2003.

Where to submit

You may transmit your completed Implementation Plan to your department's CalOHI liaison or you may send hard copies to:

California Office of HIPAA Implementation
1600 Ninth Street, Room 460
Sacramento, California 95814

CONTACT

Your Department CalOHI liaison if you have any questions.
CalOHI's liaisons are listed on our website at www.ohi.ca.gov.

Original signed by Therese Hart

BURT R. COHEN

Acting Director

California Office of HIPAA Implementation

cc: Steve Kessler, Department of Finance
Peter Harbage, Health and Human Services Agency
Department HIPAA Privacy Officers
Department HIPAA Counsel